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1 2 3 4 5	ERIK BABCOCK (Cal. 172517) LAW OFFICES OF ERIK BABCOCK 717 Washington St., 2d Floor Oakland, CA 94607 (510) 452-8400 Tel (510) 452-8405 Fax Attorney for Defendant LUKE BRUGNARA	
6 7 8	IN THE UNITED STATE	ES DISTRICT COLIDT
9	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
10 11	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
12	UNITED STATES OF AMERICA,	Nos. CR 14-00306 WHA
13 14	Plaintiff, v.	BRIEF IN RESPONSE TO COURT ORDER RE CONTINUED BAIL HEARING
15	LUKE BRUGNARA,	TIEZ TICH (O
16 17		
18	The court issued an order on August 5, 2014 requiring briefing on the status of hearing on	
19	defendant's detention.	
20	At the last hearing, the defendant's wife, Kay Brugnara, did not appear. The government	
21	indicated that it was their understanding she may no longer be willing to sign as a surety for her	
2223	husband. Following the hearing, defense counsel confirmed with Ms. Brugnara that she no	
24	longer intended to sign a bond for her husband, given the allegation brought to light by the	
25	government about Mr. Brugnara having an affair.	
26	Without Mrs. Brugnara, the undersigned did not have any other potential sureties willing	
27	to sign and put up secured property for the defendant.	
28	Brief Re Detention Hearing	

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1 However, the undersigned spoke with Mrs. Brugnara this morning, and she indicated that 2 she has changed her mind, and that she is now prepared to sign a secured bond for her husband. 3 The other primary issue still pending is the amount equity in the Sea Cliff house, 4 including both the overall value of the property, and the amount of debts already secured against 5 it. 6 7 The government raised an issue about who really owns the home. According to all the 8 title reports, the property is owned by Brugnara VI. In turn, Ms. Brugnara says that she owns the 9 company. The government has insinuated that Mr. Brugnara might own the company. 10 However, as long as both of them sign onto a bond, the bond would be secured, so ownership of 11 the company should not really be an issue. 12 Now that Mrs. Brugnara is willing to sign a bond, defense counsel needs some time to 13 14 address the equity issue. 15 Counsel has already conferred with Mr. Sprague and will continue to coordinate with him 16 and the court's deputy, then file a stipulation with a proposed hearing date next week. 17 Respectfully, 18 19 20 DATED: August 8, 2014 /S/Erik Babcock 21 ERIK BABCOCK Attorney for Defendant BRUGNARA 22 23 24 25 26 27

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